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VIA E-FILING

Honorable Ona T. Wang, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 20D
New York, New York 10007

**Re: Ahmed Ashour, et al. v. Arizona Beverages USA LLC, et al.
Index No. 1:19-cv-07081 (AT)(OTW)
Joint Status Report Regarding Discovery**

Dear Judge Wang:

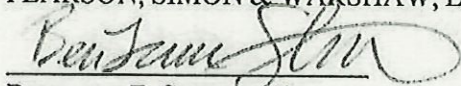
This firm represents defendants ("Defendants") in the above matter. Kindly accept this letter by way of a joint status report regarding discovery. The parties have met and conferred a number of times and are close to resolving matters concerning searches for electronically stored information and most of the topics at issue regarding Plaintiffs' Rule 30(b)(6) deposition notice. A subsequent meet and confer is expected to occur soon to discuss the remaining unresolved issues.

There remains an impasse about whether Defendants' profit and cost information is discoverable. That dispute relates to Plaintiffs' document requests and topics in the Rule 30(b)(6) deposition notice. The parties anticipate proposing a briefing schedule on a motion to compel and/or a motion for a protective order.

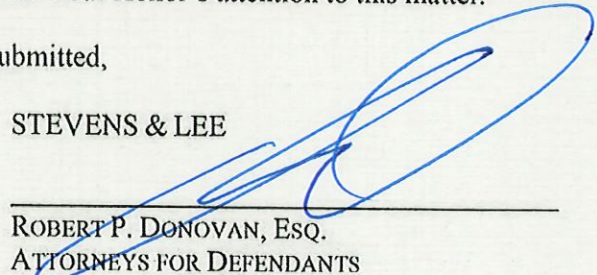
The parties have also discussed bifurcating discovery on liability and damages and/or prioritizing discovery as directed by the Court during the March 17, 2021 hearing. No agreement has been reached by the parties in this regard. Thank you for Your Honor's attention to this matter.

Respectfully submitted,

PEARSON, SIMON & WARSHAW, LLP


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